## REMARKS

In the Office Action mailed April 7, 2004, the Examiner rejected claims 1-30. By the present Response, claim 19 is amended. Upon entry of the amendment, claims 1-30 will remain pending in the present application. In view of Applicants' arguments below, reconsideration and allowance of all pending claims are respectfully requested.

### Rejections Under 35 U.S.C. § 102(e)

The Examiner rejected claims 1-4, 6, and 10-13 under 35 U.S.C. § 102 (e) as being anticipated by Halstead Jr. et al., US 6,667,750 B1 (hereinafter Halstead). Claims 1 and 10 are independent. Applicants respectfully traverse this rejection. A *prima facie* case of anticipation under 35 U.S.C. § 102 requires a showing that each limitation of a claim is found in a single reference, practice or device. *In re Donohue*, 226 U.S.P.Q. 619, 621 (Fed. Cir. 1985).

The present application is directed to the field of physical systems and networks, and to the viewing of representative displays of such systems. As described in the application, if a user changes the size of the display/viewing area, such as by dragging a virtual tool via a mouse, the present technique scales the sizes of objects (or elements) of a system (or systems) and selects what logical groupings of objects are displayed in the viewable region. As the size of the display area is contracted and the sizes of objects are increased, the technique may remove one or more of the groupings or objects from the viewable area. On the other hand, as the size of the display area is expanded and the sizes of the objects are decreased, the technique may add one or more of the groupings or objects into the viewable area. A purpose of the technique is to coherently select and display logical groupings and to avoid, for example, displaying only portions of logical groupings of objects (or elements). It should be noted that a scroll bar may be provided for the user to view the groupings or objects not immediately viewable in the display area.

***Independent Claims 1 and 10***

In making the rejection, the Examiner cited several portions of the Halstead reference as disclosing the features recited by independent claims 1 and 10. However, Applicants have carefully reviewed the portions of the Halstead reference cited by the Examiner, as well as the entire reference, and respectfully disagree with the Examiner's assertion the Halstead reference discloses the features recited in claims 1 and 10. For example, the Halstead reference does not disclose "the image being displayed in logical groupings of elements viewable in the image," as recited by independent claim 1. Halstead also fails to disclose "defining logical groupings of elements viewable in the display," as recited by independent claim 10. Indeed, the Examiner admits in the discussion of claims 14 and 15 that "Halstead does not teach that the display snaps to a new number of logical groupings." Paper 5, page 5.

Instead, the Halstead system adjusts the positions and sizes of the displayed objects, with a focus on the inputted elasticity and the preferred sizes of the objects. *See e.g.*, column 3, lines 1-11; and column 4, line 42 – column 5, line 43. The Halstead reference never addresses the logical groupings of elements. Indeed, the Halstead reference discloses that excess space or deficit space is apportioned among the objects, with no objects removed or added to the display area. *See e.g.*, column 9, lines 5-45; column 12, line 45-53; column 13, lines 1-26; column 15, lines 37-42; and column 16, lines 54-67. Clearly, the Halstead system does *not* define logical groupings of the displayed objects, as claimed. *See e.g.*, column 3, lines 1-11; column 9, lines 5-45. The Halstead reference does not even hint that objects or elements, or groupings of elements, may be removed or added to the display area as the size of the display area changes.

Therefore, the cited reference fails to disclose all of the elements of independent claims 1 and 10, and thus the Examiner has failed to establish a *prima facie* case of anticipation. Accordingly, Applicants respectfully submit that the subject matter of independent claims 1 and 10, as well as the claims dependent thereon, is not anticipated

by the Halstead reference. Applicants respectfully request withdrawal of the Examiner's rejection and allowance of the foregoing claims.

**Rejections Under 35 U.S.C. § 103**

The Examiner rejected claims 5, 14-18, and 26-30 under 35 U.S.C. § 103(a) as being unpatentable over Halstead and Okudaira et al., US 6,400,375 (hereinafter Okudaira). The Examiner rejected claims 7-9 and 19-25 under 35 U.S.C. § 103(a) as being unpatentable over Halstead in view of Tonelli et al., US 6,229,540 B1 (hereinafter Tonelli). Claims 19 and 26 are independent.

***Independent Claim 26***

With regard to claim 26, the Examiner relied on the Okudaira reference to disclose or teach "a virtual tool for adjusting the first and second dimensions." However, the cited combination fails to disclose "wherein the image includes representations of logical groupings of elements," as recited by independent claim 26. As discussed above with respect to independent claims 1 and 10, the Halstead reference clearly does not disclose logical groupings of elements, but instead apportions excess or deficit display space to the displayed objects. *See e.g.*, column 9, lines 5-45. Further, Applicants strongly assert that the Okudaira reference does not obviate this deficiency of the Halstead reference. This is clear despite the Examiner's incorrect assertion with respect to claims 14, 15, 26, and 27 that Okudaira teaches changing a number of logical groupings viewable in an image, and despite the Examiner's remark on page 3 of Paper 5 that Okudaira teaches that the number of Okudaira thumbnail images to be displayed at a time may decrease.

Applicants stress that there is no logical groupings of elements in Okudaira. The fact that the Okudaira reference mentions that thumbnail images may decrease from N upon expansion via operation of the zoom bar 123 is inapposite to the present claims. *See* Okudaira, column 8, lines 64-67. It is clear that in column 8, line 64-67 of the Okudaira

reference cited by the Examiner, the window corner 125 or framework line 126 are *not* manipulated to change the size of the image display region 111. *See* column 8, lines 58-67. Instead, the zoom bar 123 is used to expand the thumbnail images so the "details of the images of the image data can be confirmed," such as where the size of the thumbnail images become relatively small (i.e., a large N). *See* column 8, lines 58-63. In other words, the number of thumbnail images, N, typically remains fixed as the size of the image display region changes, with the sole exception where the user expands the thumbnail images to better view details of the images. And though the number of displayed images may decrease below N during this confirmation of image details, the Okudaira reference describes an arbitrary expansion with no logical groupings of the expanded thumbnail images. *See id.*

Because the cited combination of the Halstead and Okudaira references does not disclose the recited features of claim 26, the Examiner has failed to *prima facie* case of obviousness with respect to claim 26. Accordingly, independent claims 26, and the claims that depend thereon, are believed allowable over the cited combination.

***Independent Claim 19***

With regard to independent claim 19, the cited combination of the Halstead and Tonelli references does not disclose "logical groupings of representations of the components," as recited by independent claim 19, as amended. As similarly discussed above with respect to the other independent claims, the Halstead reference does not disclose "logical groupings" but instead discloses that excess space or deficit space in the viewing area is apportioned among the objects, with no objects removed or added to the display area. *See e.g.*, Halstead, column 9, lines 5-45; column 12, line 45-53; column 13, lines 1-26; column 15, lines 37-42; and column 16, lines 54-67.

Furthermore, the Examiner did not assert that the Tonelli reference discloses "logical groupings." Indeed, the Tonelli reference does not disclose such a feature, but

instead is directed to the design and management of a network (such as a local area network) and its elements, with no mention of logical groupings of representations of such elements. *See, e.g.*, column 1, lines 13-49 and 61-66.

Because the cited combination of the Halstead and Tonelli references does not disclose the recited features of claim 19, the Examiner has failed to *prima facie* case of obviousness with respect to claim 19. Accordingly, independent claims 19, and the claims that depend thereon, are believed allowable over the cited combination.

***Dependent Claims***

The Examiner relied on the combination of the Halstead and Okudaira references to reject dependent claims 5, 14-18, and 27-30. Further, the Examiner relied on the combination of the Halstead and Tonelli references to reject dependent claims 7-9 and 20-25. However, these dependent claims are believed patentable for the subject matter they separately recite as well as by virtue of their dependency on their allowable base claims.

**Conclusion**

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: June 14, 2004

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